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**Via Electronic Filing**

The Honorable Richard A. Lanzillo, U.S.M.J  
U.S. District Court, Western District of Pennsylvania  
17 South Park Row  
Erie, PA 16501

Re: *Murphy v. The Tot Baby Corporation*  
**Case No.: 1:21-cv-00209-RAL**

Dear Honorable Magistrate Judge Lanzillo:

This law firm represents Defendant The Tot Baby Corporation (the “Defendant”) in the above-referenced action.

Pursuant to Local Civil Rule 7 of the U.S. District Court, Western District of Pennsylvania, this letter respectfully serves as a request to extend Defendant’s deadline to respond to Plaintiff’s Complaint to, through and including, December 17, 2021.

The basis of this request is that the undersigned law firm is still in the process of investigating the accessibility allegations pled in Plaintiff’s Complaint. In addition, the undersigned law firm is continuing to engage in substantive settlement discussions with Plaintiff’s counsel. As these discussions typically involve accessibility requirements, they are largely framed around Defendant’s investigation, which is still underway. Thus, an extension of time is necessitated.

This is the second request of its nature. If granted, this extension would not affect any other scheduled deadlines. This request is not made on consent of Plaintiff’s counsel, who does not wish to grant a further extension of time for Defendant to file a pre-answer motion.

In light of the foregoing, it is respectfully requested that the Court extend Defendant’s deadline to respond to the Complaint to, through and including, December 17, 2021.

We thank the Court for its attention to this matter, and are available at the Court’s convenience to answer any questions related to the foregoing.

Thank you, in advance, for your time and consideration.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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